

Supporting Statement for  
EPA Information Collection Request # 1773.05  
(OMB Control # 2050-0171)

Amendments to the Reporting and Recordkeeping Requirements for National  
Emission Standards for Hazardous Air Pollutants (NESHAP)  
for Hazardous Waste Combustors; Direct Final Rule

October 2001

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## **1. IDENTIFICATION OF THE INFORMATION COLLECTION**

### **1(a) Title of the Information Collection**

This Information Collection Request (ICR) is titled “Amendments to the Reporting and Recordkeeping Requirements for National Emission Standards (NESHAP) for Hazardous Air Pollutants from Hazardous Waste Combustors; Direct Final Rule” ICR # 1773.05 (OMB Control # 2050-0171).

### **1(b) Short Characterization/Abstract**

On July 3, 2001, EPA published a direct final rule (66 FR 35087) and a notice of proposed rulemaking (66 FR 35124) promulgating and proposing thirteen amendments to provisions dealing largely with rules affecting implementation of the National Emission Standards for Hazardous Waste Combustors (subpart EEE of Part 63). For the purposes of this ICR, hazardous waste combustors (HWCs) include hazardous waste burning incinerators, cement kilns, and lightweight aggregate kilns. EPA indicated that it was promulgating these amendments as direct final rules because it believed the amendments to be non-controversial. However, the Agency further stated that if we received adverse comment by August 17, 2001 on one or more distinct provisions of the direct final rule, we would publish a timely withdrawal of those distinct provisions in the *Federal Register*, and deal with those provisions as proposed rules. We subsequently received adverse comment on four of the thirteen provisions.<sup>1</sup> Thus, the nine provisions for which we did not receive adverse comment will become effective on October 16, 2001 as provided in the July 3, 2001 direct final rule. This ICR removes the incremental recordkeeping and reporting burden associated with the four amendments that were withdrawn.

The existing paperwork burden for the final rule was approved in EPA ICR Request #1773.02 “New and Amended Reporting Requirements for National Emission Standards for Hazardous Air Pollutant from Hazardous Waste Combustors,” and later modified by EPA ICR Request #1773.03.

This ICR estimates the additional (incremental) recordkeeping and reporting burden for the four withdrawn amendments described in this action:

- The recordkeeping and reporting requirements of the four withdrawn amendments decrease the burden to the regulated community by 2 hours per year at a total labor cost of \$83 per year. This recordkeeping and reporting burden reduction is incremental to the burden approved under EPA ICR Request #1773.03.
- In addition, the withdrawn amendments will save EPA an additional 124 hours per year to review and respond to the required submissions at a cost savings of \$3,447 per year.

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<sup>1</sup> The four amendments that received adverse comment included: the amendments to §63.1201(a) and §63.1206(b)(13)(i) (alternative hydrocarbon monitoring location for short cement kilns burning hazardous waste at locations other than the “hot” end of the kiln); the amendments to §63.1206(b)(6)(i), §63.1206(b)(7)(i)(B), §63.1206(b)(7)(ii)(B), and §63.1207(c)(2)(i) (use of destruction and removal efficiency data in lieu of testing); the amendments to §63.1206(c)(7)(ii) (deletion of baghouse inspection requirements); and amendments to §63.1207(f)(1)(ii) (feedstream analysis for organic hazardous air pollutants).

## **2. NEED FOR AND USE OF THE COLLECTION**

### **2(a) Need and Authority for the Collection**

EPA promulgated revised standards for hazardous waste combustors under joint authority of the Clean Air Act and Resource Conservation and Recovery Act. See 64 FR 52828 (September 30, 1999). The standards limit emissions of chlorinated dioxins and furans, other toxic organic compounds, toxic metals, hydrochloric acid, chlorine gas, and particulate matter. These standards reflect the performance of Maximum Available Control Technology (MACT) as specified under Section 112 of the Clean Air Act.

Certain records and reports are required to ensure that the standards are being achieved on a continuous basis. These amendments are estimated to increase the recordkeeping and reporting burden.

### **2(b) Practical Utility/Users of the Data**

The data collected for new and existing HWC system operations and testing are used by facility owners and operators and EPA or the implementing agency. Data maintained in records are used to monitor results of testing, inspections, and the operation of air pollution control systems, as well as to demonstrate compliance with regulations. Notifications and submitted monitoring data are used by EPA or the implementing agency to evaluate construction / reconstruction plans, test and operating plans, test results, facility operation, and whether facilities qualify for certain exemptions and alternative monitoring / testing methods. EPA also requires notification procedures to ensure stakeholder involvement.

## **3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

### **3(a) Nonduplication**

The information collections covered in this ICR are not available from sources other than individual respondents. EPA's Office of Solid Waste is the only office within the Agency collecting this information, and no other Federal agency or department collects this information. In addition, the Office of Solid Waste has systematically reorganized its ICR structure to eliminate gaps or duplication.

### **3(b) Public Notice Required Prior to ICR Submission to OMB**

In compliance with the Paperwork Reduction Act of 1995, EPA is issuing a public notice in the Federal Register concerning the submittal of this ICR to the Office of Management and Budget (OMB) and its availability to the public for comment. This notice is contained in a paragraph of the direct final rule Federal Register notice.

### **3(c) Consultations**

The direct final rule amendments covered by this ICR will be promulgated using proper rulemaking procedures. EPA has made efforts to consult with the respondent stakeholders, general public, State and industry officials, and the appropriate Federal agencies in the development of the burden estimates for this (and previous related) ICRs.

EPA has worked and consulted directly with the respondent stakeholders and trade group associations

when developing these amendments, and that these amendments are a direct result of comments from and meetings with the impacted respondents.

### **3(d) Effects of Less Frequent Collection**

EPA has carefully considered the burden imposed upon the regulated community by hazardous waste combustion regulations and the potential environmental consequences of reducing the information collection frequencies. Consequently, EPA is confident that those activities required of respondents are necessary, and to the extent possible, minimize the burden imposed. EPA believes that, if the minimum requirements specified under the regulations are not met, EPA will be unable to fulfill its Congressional mandate under the Resource Conservation and Recovery Act and Section 112 of the Clean Air Act. In addition, efforts were made to integrate the monitoring, compliance testing, and recordkeeping requirements of the CAA and RCRA so that facilities will be able to avoid duplicity of two potentially different regulatory compliance schemes.

### **3(e) General Guidelines**

This ICR adheres to the guidelines stated in the 1995 Paperwork Reduction Act as amended, OMB's implementing regulations, OMB's Information Collection Review Handbook (EPA, April 1998), and other applicable OMB guidance.

It is necessary for facilities to retain records for five years in order for EPA to ensure compliance with the regulations. The recordkeeping burden for such a requirement is not significant.

### **3(f) Confidentiality**

Section 3007(b) of RCRA and 40 CFR Part 2, Subpart B, which define EPA's general policy on the public disclosure of information, contain provisions for confidentiality.

### **3(g) Sensitive Questions**

No questions of a sensitive nature are included in any of the information collection requirements.

## **4. RESPONDENTS AND THE INFORMATION COLLECTED**

### **4(a) Respondents/NAICS Codes**

The following lists North American Industry Classification System (NAICS) codes associated with the facilities most likely to be affected by this ICR:

<u>NAICS</u>	<u>Industry Type</u>
2123	Nonmetallic Mineral Mining
2211	Electric Power Generation
22132	Sewage Treatment Facilities
3241	Petroleum and Coal Products
3271	Clay Product and Refractory
3231	Printing and Related Support
3251	Basic Chemical Manufacturing
3252	Resin, Synthetic Rubber, and Plastic
3253	Pesticide and Fertilizer

3254	Pharmaceutical and Medicine
3255	Paint, Coating, and Adhesive
3259	Other Chemical Products
3271	Concrete Block and Brick
3273	Cement and Concrete Product
3274	Lime and Gypsum Product
3279	Other Nonmetallic Mineral
3327	Machine Shops; Turned Product
3328	Coating, Engraving, Heat
3329	Other Fabricated Metal Product
3332	Industrial Machinery
3335	Metalworking Machinery
3339	Other General Purpose Equipment Manufacturing
3341	Computer and Peripheral
3342	Communications Equipment
3343	Audio and Video Equipment
3344	Semiconductor
3361	Motor Vehicle Manufacturing
3362	Motor Vehicle Body and Trailer
3363	Motor Vehicle Parts
4227	Petroleum Wholesalers
45431	Fuel Dealers
5622	Waste Treatment and Disposal
5629	Remediation and Other Waste

#### **4(b) Information Collected**

A. Below is a description of the nine amendments included in EPA ICR Request #1773.03 that are not impacted by the withdrawal action.

##### **1. Hazardous Waste Residence Time**

EPA is modifying the definition of hazardous waste residence time so that recycled hazardous waste-derived materials should not be considered when calculating hazardous waste residence time (§63.1201(a)).

- (i) Data items, including recordkeeping requirements

The comprehensive performance test workplan must discuss procedures for determining the hazardous waste residence time.

- (ii) Respondent activity

None.

##### **2. Deletion of One-Time Notification of Compliance with Alternative Clean Air Act Standards**

- (i) Data items, including recordkeeping requirements

EPA is deleting the requirement to submit a one-time notification of compliance that would have been used to alert regulatory officials that a source wants the option of complying with otherwise applicable

MACT standards after the hazardous waste residence time has expired (§63.1206(b)(1)(ii)).

(ii) Respondent activity

Facilities will no longer have to submit the one-time notice to the Agency.

3. Time Extension for Waiving PM and Opacity Standards to Correlate PM CEMS

(i) Data items, including recordkeeping requirements

EPA is allowing a waiver of the particulate matter (PM) and opacity standards during PM CEMS correlation tests beyond 96 hours if approved by the Administrator.

(ii) Respondent activity

Sources can choose to submit a request to the Administrator, most likely as part of the performance test workplan, for an extension to the 96 hour waiver of the particulate matter and opacity standards.

4. Alternative to the PM Standard for Incinerators Feeding Low Levels of Metals

(i) Data items, including recordkeeping requirements

EPA is revising the “alternative particulate matter (PM) standard” option of the final rule. Specifically, the final rule alternative particulate matter standard will be replaced with alternative requirements that include: (1) 90% semivolatile metals system removal efficiency demonstrated during the comprehensive performance testing; (2) semivolatile and low volatility metals emission limitations (including the non-enumerated metals HAPs of Co, Ni, Mg, and Se) also must be achieved during performance testing; and (3) semivolatile and low volatility metals feedrate limitations must be achieved in both the hazardous waste and total feedstreams (including non-enumerated HAPs) on a 12-hour average basis (as required by the final rule). Sources electing to comply with these alternative requirements do not have to meet the 0.015 gr/dscf particulate matter standard; instead they remain subject to the RCRA particulate matter standard of 0.08 gr/dscf.

(ii) Respondent activity

As part of the comprehensive performance test work plan, incinerator facilities may request the option of complying with the alternative particulate matter standard.

Demonstration of compliance with the alternative to the particulate matter standard requires: (1) the evaluation of semivolatile metals system removal efficiency and semi- and low volatile metals emissions levels (including the non-enumerated metals) during the comprehensive performance test, (2) measurement of particulate matter emissions, and (3) documentation of metals feed rates from all feedstreams (including non-enumerated metals) on a daily basis.

5. Revisions to the Metals Feedrate Extrapolation Procedures

(i) Data items, including recordkeeping requirements

The final rule currently requires documentation that the levels of metal spiking assure that any extrapolation procedures are as accurate and precise as if no extrapolations were used. See §63.1207(f)(1)(x)(C). This is being modified to require documentation that an extrapolation procedure

adequately assures compliance with the emission standards.

(ii) Respondent activity

If using extrapolation to set metals feed limits, the performance test workplan must include justification that the extrapolation procedure assures compliance with the emissions standards. Note that there will be no additional recordkeeping and reporting activities under this revision compared with the final rule.

6. Feedrate Limits for Nondetectable Constituents

(i) Data items, including recordkeeping requirements

The final rule specifies that separate “non-detect feedrate limits” must be established for constituents with non-detect measurements made during the compliance testing. Under this approach, feed locations that have “non-detect” limits could not, during normal operations, feed detectable levels of the constituent unless certain criteria is met. See §63.1207(n). EPA is eliminating this provision for identifying feedrate limits and replacing it with a provision that requires the source, on a site-specific basis, to specify a method to be used to account for non-detects when establishing feedrate limits.

(ii) Respondent activity

Specify in the performance test workplan the method to be used to account for non-detects when establishing feedrate limits.

7. Revisions to Assist Early Compliance

EPA is eliminating two impediments to early compliance (see §62.1207(5) and §63.1211(d)). First, early complying sources that fail the comprehensive performance test will not be required to stop burning hazardous waste. Second, early complying sources will be exempt from the Documentation of Compliance requirements.

(i) Data items, including recordkeeping requirements

None.

(ii) Respondent activity

None.

8. Accuracy Requirements for Weight Measurement Devices

(i) Data items, including recordkeeping requirements

EPA is eliminating the weight measurement device accuracy requirement for everything except carbon injection systems and requiring sources to specify an appropriate accuracy requirement for each device in the continuous monitoring system evaluation test plan.

(ii) Respondent activity

The continuous monitoring system evaluation plan and test plan will continue to include calibration frequency, accuracy requirements, and procedures for all measurement and monitoring devices.



9. Deletion of Requirement for Establishing a Scrubber Liquid Minimum pH Operating Parameter Limit for Mercury Control for Wet Scrubbers

- (i) Data items, including recordkeeping requirements

EPA is deleting the requirement to establish a minimum pH limit to ensure compliance with the mercury standard.

- (ii) Respondent activity

Deleting the minimum pH limit for mercury control is not likely to change the recordkeeping and reporting activity because a minimum pH limit is still required to ensure compliance with the HCl and chlorine gas standard.

B. Below is a description of the four amendments included in EPA ICR Request #1773.03 that are withdrawn.

1. Use of DRE Data in Lieu of Testing

- (i) Data items, including recordkeeping requirements

Two revisions are being made to the “data-in-lieu” provisions -- under which previous testing results are used in place of the requirement for further source testing (§63.1206(6)-(7)). The first revision eliminates the age restriction on usable destruction and removal efficiency (DRE) test data. The second revision eliminates the requirement that specifies that in-lieu data must have been collected for the purpose of RCRA permit issuance or re-issuance.

- (ii) Respondent activity

If a source chooses to submit DRE data from testing for a purpose other than RCRA permit issuance or reissuance in lieu of conducting a new DRE test, the source must document that the quality of the data are suitable for a compliance determination.

2. Alternative Hydrocarbon Monitoring Location for Short Cement Kilns Burning Hazardous Waste at Locations Other Than the “Hot” End of the Kiln

- (i) Data items, including recordkeeping requirements

EPA is finalizing an alternative hydrocarbon standard, and in limited situations, an alternative carbon monoxide standard for cement kilns that continuously monitor hydrocarbon both in the by-pass duct and at a preheater tower combustion gas monitoring location (§63.1206(13)(b)(i)). Also, a new definition for a cement kiln preheater tower combustion gas monitoring location is being finalized (§63.1201(a)).

- (ii) Respondent activity

If a source chooses to request the waiver to reduce the cost of compliance, the request must be made as an additional item in the comprehensive performance test plan.

3. Deletion of Baghouse Inspection Requirements

- (i) Data items, including recordkeeping requirements

EPA is deleting all of the prescribed baghouse inspection requirements and instead relying on the general operation and maintenance plan requirements under §63.1206(c)(7)(i), in combination with the bag leak detector, to ensure proper operation and maintenance of the baghouse. Thus, the operating and maintenance plan will identify site-specific inspection intervals for baghouse operations.

- (ii) Respondent activity

Recordkeeping and reporting of baghouse monitoring and inspection efforts will be reduced because each source will identify site-specific monitoring and inspection procedures in the operation and maintenance plan, rather than complying with generic, comprehensive procedures.

#### 4. Feedstream Analysis for Organic HAPs

- (i) Data items, including recordkeeping requirements

EPA is revising the rule to: (1) allow less comprehensive organics analysis of waste streams if warranted on a site-specific basis; and (2) require organics analysis of hazardous waste feed streams only.

- (ii) Respondent activity

On a site-specific basis, facilities will identify (and provide rationale for selection) which feedstream will be subject to characterization of organic constituents. This site-specific plan would be included in both the feedstream analysis plan and performance test plan.

The revision will not increase the actual recordkeeping and reporting activity unless a source chooses to request less comprehensive analysis of waste streams. If so, the source must document in the test plan and feedstream analysis plan the rationale for reduced analysis.

### **5. THE INFORMATION COLLECTED -- AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

This section discusses how EPA will collect the information, what activities EPA will perform with the collected information, and how EPA will manage the information it collects. This section also discusses how the information collection requirements affect small entities.

#### **5(a) Agency Activities**

Most of the items in this ICR are new or modified provisions allowing affected sources to request or petition to comply with alternative approaches that generally reduce the burden of the final rule. In many cases, these requests would be included in the comprehensive performance test plan, continuous monitoring system evaluation plan and test plan, or the operating and maintenance plan. All of these documents, including the requests, would be reviewed and approved by the Agency. Thus, Agency time to review and approve these documents would be somewhat increased as a result of some of the requirements in the proposed rule. Section 6(c) below shows the estimates of increased Agency burden for the various proposed requirements.

## **5(b) Collection Methodology and Management**

Much of the ICR activity is comprised of reporting requirements that will be submitted by mail directly to the Agency for review.

Also, some recordkeeping information will also be kept in facility files. This requires the implementing authority to visit and collect from the facility, or request by mail, any information it wishes to review.

Agency management of collected information includes review of information, making determinations, and filing and storing information collected.

In collecting and analyzing information required for hazardous waste combustors, EPA uses electronic equipment, including telephone systems, personal computers, electronic mail, and database software, as necessary.

## **5(c) Small Entity Flexibility**

EPA identified six out of 171 identified combustion facilities as small entities. EPA conducted an incremental assessment of any cost savings or cost burdens that may result from these amendments to the final rule on the small entities. Based on our assessment, the Agency concluded that there will not be any significant cost burdens or cost savings across all the small business facilities for any of the amendments. For details of the analysis, see Regulatory Flexibility Screening Analysis (RFSA) For NESHAP: Standards for Hazardous Air Pollutants for Hazardous Waste Combustors (May 2001) and Adjustments to the Economic Assessment and Regulatory Flexibility Screening Analysis in Response to the Withdrawal of Four Amendments Previously Submitted Under: NESHAP: Standards for Hazardous Air Pollutants for Hazardous Waste Combustors, Direct Final Rule (October 4, 2001) in the docket to this rulemaking.

## **5(d) Collection Schedule**

Most of the ICR requirements have clearly defined reporting schedules. For example, test plan and operating and maintenance plans are required to be submitted in a intermittent, but well defined manner, prior to compliance testing and facility operations.

Although the means by which respondents submit the information is not specified, it should be submitted to the Agency as paper copies and computer files if possible.

# **6. ESTIMATING THE BURDEN AND COST OF COLLECTION**

## **6(a) Estimating Respondent Burden**

Burden estimates are based on recent Information Collection Request preparations associated with the HWC MACT final rule (ICR #1773.02) and later modified by ICR #1773.03. These involved consultations with respondents from the regulated community, general public, state and Federal agencies.

## **6(b) Estimating Respondent Cost**

Respondent burden hours and costs associated with all requirements covered by this ICR are shown in Exhibit 1 and have been annualized over the 3 year period of this ICR. Cost estimate assumptions are discussed in the following four sections.

(i) Estimating Labor Costs

EPA estimates the average hourly labor cost for respondents is \$93.97 for legal staff, \$71.49 for managerial staff, \$55.00 for technical staff, \$71.49 for consultants staff, and \$26.48 for clerical staff. These rates are based on the Bureau of Labor Statistics' employment cost statistics, and have been updated at a 3% inflation index to current year dollars. These rates are also consistent with the rates typically paid by the regulated hazardous waste combustor community.

(ii) Estimating Capital and Operating and Maintenance Costs

Capital and operating and maintenance costs include submittal of information and notices to the permitting agency. This will include mailing (\$10.00 per package via registered mail) and photocopying expenses (\$0.04 per page).

(iii) Capital / Start-Up Costs

There are no capital / start-up costs associated with these ICR burdens.

(iv) Annualized Capital / Start-Up Costs

One time costs are annualized over the expected length of the equipment lifetime.

**6(c) Estimating Agency Burden Cost**

Agency burden hours and costs associated with all requirements covered by this ICR are shown in Exhibit 2. Burden is due to increased hours to review and approving, if necessary, test workplans, petitions, and requests.

**6(d) Estimating the Respondent Universe and Total Burden and Costs**

The estimated burden and costs discussed in this section represent the average burden and cost incurred by a hazardous waste combustor facility. Actual burden for each facility will vary, depending on the number, capacity, and complexity of the combustion units at the facility.

(i) Universe Determination

The Agency estimates that 171 facilities with hazardous waste combustion units are impacted by the proposed amendments. This includes 33 cement kilns at 18 sites, 10 lightweight aggregate kilns at 5 sites, 26 commercial incinerators at 20 sites, and 160 on-site incinerators at 128 sites.

(ii) Activities

A. Below is a description of the burden of the nine amendments included in EPA ICR Request #1773.03 that are not impacted by the withdrawal action.

0. Familiarize With Rule

All 171 HWCs will read the rule.

1. Hazardous Waste Residence Time

There are no additional recordkeeping or reporting burdens associated with this amendment.

2. Deletion of One-Time Notification of Compliance with Alternative Clean Air Act Standards

The deletion of a one-time notification of compliance with alternative MACT standards after the hazardous waste residence time has expired will reduce the reporting burden of the final rule by a small amount.

3. Time Extension for Waiving PM and Opacity Standards to Correlate PM CEMS

Because it is anticipated that few (if any) units will choose to petition the Administrator to use PM CEMS, there will be no burden from allowing time extensions from particulate matter and opacity standards to complete correlating PM CEMS based on a written request.

4. Alternative to the PM Standard for Incinerators Feeding Low Levels of Metals

It is projected that these alternative to the particulate matter (PM) standard provisions will be used at 5 incinerator facilities. Testing, reporting, and recordkeeping burdens associated with the new modified alternative particulate matter standard are very similar to those under the general MACT rule. Minor differences include: (1) the alternative particulate matter standard requires semivolatile metals system removal efficiency testing (which can be incorporated in the standard semivolatile metals testing, thus carries no additional burden); and (2) the additional requirement for the characterization of the four non-enumerated metals (Co, Ni, Mn, and Se) in the feed and emissions streams.

Note additionally, that this alternative is not a requirement, but rather an option that could be used in lieu of the final rule particulate matter standard requirements. Overall, it is projected that the net cost burden for sources using this alternative will be significantly reduced because of the cost savings as a result of reduced requirements to upgrade the particulate matter air pollution control system (reduced as a result of complying with the alternative standard requirements compared with the 0.015 gr/dscf particulate matter standard).

5. Revisions to the Metals Feedrate Extrapolation Procedures

There are no additional recordkeeping or reporting burdens associated with the modifications to the requirements for using extrapolation to set metals feedrate limits.

6. Feedrate Limits for Nondetectable Constituents

Procedures for setting feedrate limits must be contained in the comprehensive test workplan. It is estimated that 25% of facilities will need to document how they will handle non-detected constituents when determining feedrate limitations. Each request is estimated to take 0.5 hours to prepare.

7. Revisions to Assist Early Compliance

Sources that elect to comply early will not be required to submit a Documentation of Compliance, thus reducing reporting burden. EPA estimates that 5% of sources will comply early and will not have to prepare and submit a Documentation of Compliance.

8. Accuracy Requirements for Weight Measurement Devices

Sources will still be required to specify an appropriate accuracy requirement for weight measurement

devices, in lieu of the current generic requirement, and to include the requirement in the continuous monitoring system evaluation plan and test plan. Thus, the recordkeeping and reporting activity will not change.

9. Revisions to Operating Parameter Limits for Wet Scrubbers

The elimination of the minimum pH operating limit for mercury is anticipated to have no significant impact on recordkeeping and reporting requirements compared with those of the final rule.

B. Below is a description of the burden of the four amendments included in EPA ICR Request #1773.03 that are withdrawn.

1. Use of DRE Data in Lieu of Testing

The rule will increase the potential for the use of previous testing results in place of requirements for new testing. Thus, it will reduce the need for new testing. Note though, the direct final rule will not reduce the recordkeeping and reporting burden of the final rule significantly because the final rule ICR assumed that existing destruction and removal efficiency (DRE) data will be allowable for confirmation of compliance with the DRE standard for most all facilities.

2. Alternative Hydrocarbon Monitoring Location for Short Cement Kilns Burning Hazardous Waste at Other Locations Than the “Hot” End of the Kiln

A one-time request to use the alternative hydrocarbons and carbon monoxide monitoring provisions must be included in the performance test workplan. EPA estimates that 3 cement kilns will choose to make this request. Each request is estimated to take 1.5 hours to prepare.

3. Deletion of Baghouse Inspection Requirements

The requirement that sources identify and comply with baghouse inspection and monitoring requirements on a site-specific basis rather than comply with the generic, comprehensive requirements in the final rule will reduce recordkeeping and reporting activities somewhat. For example, a source could conclude that less frequent inspections, or alternative monitoring activities, will be more appropriate, and less burdensome, for its facility. Moreover, however, baghouse inspection and monitoring activities must be specified in the source’s operation and maintenance plan irrespective of whether those activities are developed on a site-specific basis or the prescribed activities in the final rule.

4. Feedstream Analysis for Organic HAPs

The direct final rule will reduce the feedstream organic characterization requirements by not requiring analysis of non-hazardous waste feedstreams and by allowing sources to conduct less comprehensive analysis of organic compounds. This reduced analytical burden also reduces recordkeeping and reporting activities somewhat.

**6(e) Bottom Line Burden Hour and Cost Tables**

Exhibit 1 shows that the recordkeeping and reporting requirements of the four withdrawn amendments decrease the burden to the regulated community by 2 hours per year at a total labor cost of \$83 per

year. This recordkeeping and reporting burden reduction is incremental to the burden approved under EPA ICR Request #1773.03.

In addition, Exhibit 2 shows that the withdrawn amendments will save EPA an additional 124 hours per year to review and respond to the required submissions at a cost savings of \$3,447 per year.

#### **6(f) Reasons for Change in Burden**

This ICR shows the estimated incremental burden reduction resulting from withdrawal of the four direct final amendments that received adverse public comment (EPA ICR Request #1773.03).

#### **6(g) Burden Statement**

The average respondent reporting and recordkeeping burden under this ICR is estimated to be less than 1 hour/year per facility. Each burden component is estimated to be as follows:

- The average respondent reporting burden under this ICR is estimated to be about 0 (zero) hours per year per facility.
- The average respondent recordkeeping burden is estimated to be about 0 (zero) hours per year per facility.

Burden means that total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purpose of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise inclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a valid OMB control number.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing the respondent burden, including through the use of automated collection techniques, to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822), 1200 Pennsylvania Ave, N.W., Washington, DC, 20460; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17<sup>th</sup> Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Include the EPA ICR number and OMB control number in any correspondence.